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14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 PATRICIA LOMBARDO,

17 Plaintiff,

18 vs.

19 PROPERTY AND CASUALTY INSURANCE  
20 COMPANY OF HARTFORD; ALE  
21 SOLUTIONS, INC; DOES I-1 and ROES 1-5,  
22

Defendant.

23 No. 2:17-CV-02242-JCM-PAL

24 **STIPULATION TO EXTEND  
25 DEADLINES**

26 **(SECOND REQUEST)**

27 Plaintiff Patricia Lombardo and defendant Property and Casualty Company of  
28 Hartford hereby stipulate and request the Court to extend expert discovery, dispositive  
motion, and pre-trial order deadlines in this case by 45 days, resulting in the following  
changes:

- 29 • Expert discovery deadline will be extended from January 12, 2019 through and  
30 including February 26, 2019;
- 31 • Dispositive motion deadline will be extended from February 11, 2019 through and  
32 including March 28, 2019.
- 33 • Pre-trial order deadline will be extended from March 13, 2019 through and  
34 including April 29, 2019.

1           The parties recently mediated the case with Judge Pro. Although they were unable  
2 to reach a lump-sum settlement, the parties are working toward resolving this case by  
3 referring it to a binding, non-judicial appraisal process, but they need time to work out the  
4 parameters of the stipulated appraisal procedure. The parties would like to avoid the  
5 expenses associated with expert discovery and further trial preparation while they explore  
6 resolution.

7           The parties certify this stipulation was done in good faith and not for the purposes of  
8 delay.

9           DATED this 6<sup>th</sup> day of December 2018.  
10

11           HAMILTON LAW LLC

12           By: /s/ Ryan Hamilton

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20           OGLETREE, DEAKINS, NASH, SMOAK &  
21           STEWART, P.C.

22           By: /s/ Ann-Martha Andrews

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*Attorneys for Defendant Property and  
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21           LAW OFFICE OF DAVID ORTIZ

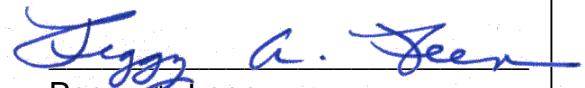
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27           *Attorneys for Plaintiff Patricia  
28 Lombardo*

Having reviewed and considered the matter, the parties state that they recently unsuccessfully mediated this case, but are "working toward resolving this case by referring it to a bindind, non-judicial appraisal process, but need more time to work out the parameters." They wish to avoid the expense with expert discovery and further preparation while they explore resolution, but have not provided any assurance that they have or will be able to reach a binding resolution before the expiration of the third extension of the discovery plan and scheduling order deadlines they propose. Accordingly,

**IT IS ORDERED** that the parties' Stipulation (ECF No. 34) is **DENIED without prejudice.**

**Dated:** December 21, 2018



Peggy A. Leen  
United States Magistrate Judge

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrant:

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*Attorneys for Plaintiff Patricia Lombardo*

DATED this 6<sup>th</sup> day of December 2018.

/s/ Elizabeth Linville

Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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